

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



United States
Environmental Protection
Agency

Office of Pesticide Programs

ETI H2O, INC.
725 Gillespie Way
El Cajon, CA 92020

MAR 15 2010

AGENT: Steptoe and Johnson, LLP
330 Connecticut Avenue, N.W.
Washington, D. C. 20036-1795

Attention: Elizabeth Brown, Ph.D.

Subject: SDC3A
EPA Registration No. 72977-5
Amendment Dated November 13, 2009

The amendment, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable, provided that you make the following labeling changes.

1. On page 4 of the proposed label, delete the reference to "Influenza A virus (H3N2)".
2. On page 4 of the proposed label, delete the reference to "Escherichia coli O157:H7".
3. On page 9 of 10 of the Efficacy review states that the submitted efficacy data (MRID 479124-04) support the use of the product as a disinfectant with virucidal activity against "Murine Norovirus" on hard, non-porous surfaces in the presence of a 5% organic soil load for a 10-minute contact time. Please note that Efficacy of the product was not demonstrated against Murine Norovirus for a 5-minute contact time.
4. Revise the proposed label to provide adequate dosage recommendations and complete directions for use of the product as a deodorizer. The proposed label states that the product can be used as a deodorizer.
5. On page 1 of the proposed label, identify the EPA registration number as "72977-5".

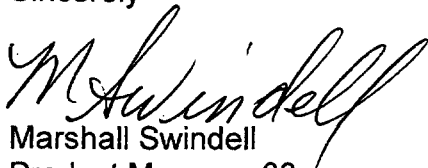
Page 2
EPA Registration No. 72997-5

6. On page 8 of the proposed label, delete the reference to "Equine herpes virus type 1".
7. On page 2 of the proposed label, delete the following surfaces as the product is not for use on utensils, dishes, or glassware: animal feeding dishes, baby bottles, pacifiers, and pet bowls.
8. On page 6 of the proposed label, change "either into or in contact with the human body, either into or in contact with the bloodstream" to read "either into or in contact with the bloodstream".
9. Refer to the enclosed copy of the Efficacy Review under "CONCLUSIONS" and "RECOMMENDATIONS" for further comments.

Submit two (2) copies of the final printed labeling for our review. A stamped copy of the "accepted" product labeling is enclosed for your records.

If you have any questions concerning this letter, please contact Martha Terry at (703) 308-6217.

Sincerely



Marshall Swindell
Product Manager 33
Regulatory Management Branch 1
Antimicrobials Division (7510P)

Enclosures

SDC3A

[Disinfectant], [Fungicide] [& Virucide*][& Food Contact Surface Sanitizer]

[Disinfects and Deodorizes] • [Food Contact Surface Sanitizer] • [Sanitizer for Food Contact Surfaces] • [Restaurants] • [Hospitals] • [Schools] • [Homes] • [Offices] • [Trucks] • [Trailers] • [Shipping Containers] • [Rail Cars] • [Sanitizer for food [and beverage] processing equipment [facilities]]

Active Ingredient

Silver[†] 0.003%
Citric Acid 4.846%

Other Ingredients 95.151%
Total 100.000%

[†] Electrolytically generated silver ions stabilized in citric acid as silver dihydrogen citrate

KEEP OUT OF REACH OF CHILDREN

Manufactured by ETI H2O
A Division of PURE Bioscience
1725 Gillespie Way
El Cajon, CA 92020
EPA REG. No. 72977-
EPA EST. No. 72977-CA-001
Net Vol.

[Batch Number – may appear on container]

ACCEPTED
with COMMENTS
EPA Letter Dated:

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Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 72977-5

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

SDC3A [this product] is a colorless, odorless, broad spectrum antimicrobial [sanitizer], disinfectant and deodorizer. Proven to kill bacteria, fungus and viruses*, **SDC3A** [this product] should be used on non-porous environmental hard surfaces in **Choose from the lists below**

Note: Non food contact sites

Homes [households]
offices
hospitals
nursing homes
medical clinics
dental clinics
infirmary
blood bank[s]
pharmacies
laboratories
funeral homes
veterinary clinics
animal shelters
kennels
cages
stables
catteries
animal transport vehicles

ambulances
patient transfer vehicles
hotels
restaurants
bars
supermarket[grocery store]
schools
colleges
dorm rooms [dormitories]
churches
shelters
military [installations]
[locations]
day care facilities
daycare centers
nurseries
playrooms
playgrounds

recreational facilities
prisons [jails]
kitchens[public] restrooms
bathrooms
washrooms
laundry rooms
bedrooms
basements
garage(s)
workshops
attics
locker rooms
exercise facilities
gyms [gymnasium]
beauty shops or salons)
barber shops
spas
health clubs

laundromats
airports
school buses
cars [autos]
RV [mobile home]
trucks
trailers
shipping containers
rail cars
subways
trains
airplanes
ships
cruise ships
busses
other public transportation vehicles

Note: Food Contact sites

beverage plants
food processing plants
[facilities]
food storage areas
food [beverage] prep areas
institutional kitchens
cafeterias
bars
fast food operations
coffee [donut] [bagel]shops

delis
liquor [convenience] stores
eating establishments
supermarkets [grocery stores]
snack bars
dinning rooms
lunchrooms
break rooms
dairy farms [facilities]

egg processing plants
meat [poultry]
[fish]processing plants
meat [poultry]
[fish]producing establishments
rendering plants
[milk] [fruit] [vegetable]
[wine] [ice cream] [potato]
processing facilities

[Food service] [hospitality]
Cruise ship food processing [preparation] areas
Dining halls
smokehouses

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SDC3A [this product] has been formulated to treat hard, non-porous environmental surfaces (painted, glazed tile, plastic, metal, glass, glazed porcelain) and objects including **Choose from the lists below**

NOTE: Non-food contact surfaces

walls
floors
counters
cabinets [cabinet handles]
sinks
tubs
exterior toilet [urinal] surfaces
faucet handles
showers
doorknobs
handrails
light switch covers
telephones

remote controls
appliances
stove tops
bed frames
wheelchairs
over-bed tables
examination tables
waste containers
tables
chairs
patio furniture
equipment tables
lab benches
[AC] [heating] vents

children's toys
toys
toy boxes
play tables
jungle gyms
playhouses
baby furniture
child car seats, hard surfaces only
booster chairs [seats]
strollers [stroller handles]
cribs
playpens
activity centers

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the purpose of registration under Reg. No. 72917-5

72917-5

NOTE: Food Contact Surfaces

counters [countertops]
dish racks
drainboards
~~pot bowls [pails]~~
~~plastic cutting boards~~
[troughs]
highchairs [trays]

~~pacifiers~~
~~baby bottles~~
breast pump [parts]
lunch boxes[pails]
picnic tables
drinking fountains
kitchen surfaces

food processing equipment
bottling equipment
pre-mixing equipment
blenders
[food] processors
beverage bars [equipment]
buffet counters

salad bars
snack counters
cutting boards
plastic and other non-porous chopping blocks
coolers
ice[machines] chests

NOTE: Food Contact Surfaces continued

ice cream machines
[equipment]

yogurt machines
[equipment]refrigerator

bins used for meat, vegetables, fruit and eggs

[refrigerated] food display equipment

NOTE: [Bracketed] text is optional wording. Bold/italicized text is information only and not part of the label. Page 2 of 10

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food cases
dairy cases
food contact surfaces
food trays
stovetops
blenders
meat cutting machines
bread slicing machines
mixing equipment [mixers]
kitchen appliances
[meat], [fish], [poultry]
washers
blanchers
dicers
slicers
grinders
shredders
stuffers
scalders
pickers
shackles
saws
trolleys

hooks
tables
hoists
sorters
scales
cones
deboners
separators
carts
racks
chiller tanks
conveyor systems
labeling machines
packaging equipment
canning equipment
descalers
skinning equipment
filleting machines
homogenizers
evaporators
dryers
clarifiers
storage tanks

cheese making equipment
processing vessels
pumps
pasteurizers
filling line equipment
Tanks
Kettles
filling, seaming, sealing
and capping equipment
pulpers
juicers
millers
grinders
ovens
extractors
blanchers
refrigerators
freezers
microwaves
toasters
cooking equipment
ovens
ranges

grills
fryers
choppers
Under the Federal Insecticide,
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72977-5
cabinets
sinks
basins
faucets
bakery equipment
coffee and tea equipment
steam tables
warming equipment
concession equipment
[processing] vacuums
[processing] hand [power]
tools

General Information

[SDC3A [this product] successfully killed the following organisms under AOAC protocols (In order to ensure that all organisms listed are killed, you must use the contact times as directed in the Application Instructions):

Organism	Kill Time
<i>Pseudomonas aeruginosa</i>	30 seconds
<i>Salmonella enterica</i>	30 seconds
<i>Staphylococcus aureus</i>	2 minutes
<i>Listeria monocytogenes</i>	2 minutes
Vancomycin resistant <i>Enterococcus faecium</i> (VRE)	2 minutes
Methicillin resistant <i>Staphylococcus aureus</i> (MRSA)	2 minutes
Community Associated Methicillin resistant <i>Staphylococcus aureus</i> (CA-MRSA)	2 minutes
Community Associated Methicillin resistant <i>Staphylococcus aureus</i> (CA-MRSA-PVL)	2 minutes
<i>Escherichia coli</i> O157:H7	2 minutes
<i>Acinetobacter baumannii</i>	2 minutes
<i>Campylobacter jejuni</i>	2 minutes
Trichophyton mentagrophytes (Athlete's Foot Fungus)	10 minutes
*HIV type 1 [Strain HTLV IIIB]	30 seconds
*Herpes Simplex Type 1 [VR-733 F(1) Strain]	1 minute [60 seconds]
*Rotavirus	3 minutes
*Human Coronavirus	3 minutes
*Influenza A (H1N1)	1 minute [60 seconds]
*Swine Influenza A (H1N1)	1 minute [60 seconds]
*Respiratory Syncytial Virus [RSV]	3 minutes
*Adenovirus Type 2	3 minutes
*Murine Norovirus [MNV-1]	10 minutes
*Norovirus [as Feline Calicivirus]	10 minutes
*Avian Influenza A	10 minutes
*Influenza A [VR-544, Hong Kong strain]	10 minutes
*Rhinovirus [R37 VR-1147, Strain 151-1]	10 minutes
*Polio Type 2, [VR-1002, Lansing Strain]	10 minutes

[Fungicidal Activity: SDC3A [this product] is effective against *Trichophyton mentagrophytes*, the Athlete's foot fungus, Use in locker rooms, dressing rooms, shower and bath areas, and exercise facilities.]

ACCEPTED
with COMMENTS
EPA Letter Dated:

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[Deodorizes: SDC3A [this product] reduces annoying odors caused by bacteria. Use to control odors in hospitals, homes, public restrooms, animal kennels and barn stalls. In private homes, use in the kitchen, bathroom, and basements.]

[**SANITIZATION: SDC3A is a food contact surface sanitizer proven to kill 99.999% of the following bacteria in 60 seconds:
Escherichia coli, Staphylococcus aureus
See application instructions for proper use.]

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No.

729775

APPLICATION INSTRUCTIONS

Pre-clean surfaces prior to using this product.

General Disinfection:

For general disinfection and control of the bacteria *Pseudomonas aeruginosa*, *Staphylococcus aureus*, *Salmonella enterica*, *Listeria monocytogenes*, Vancomycin Resistant *Enterococcus faecium* (VRE), Methicillin Resistant *Staphylococcus aureus* (MRSA), Community Associated Methicillin resistant *Staphylococcus aureus* (CA-MRSA), Community Associated Methicillin resistant *Staphylococcus aureus* (CA-MRSA-PVL), *Escherichia coli* O157:H7, *Acinetobacter baumannii* and *Campylobacter jejuni* the surface must be completely wet with SDC3A [this product] for 2 minutes. The surface may then be wiped dry with a clean towel. When used as directed, SDC3A [this product] provides residual protection from *Pseudomonas aeruginosa*, *Staphylococcus aureus* and *Salmonella enterica* up to 24 hours after initial application. Do not [touch] [contact] treated surface after application if residual protection is to be maintained.

NOTE: The following condensed instructions may be use in place of the above paragraph.

To kill bacteria, [apply] [spray] [mist] SDC 3A [this product] to the surface until thoroughly wet for 2 minutes. The surface may then be wiped dry with a clean towel. When used as directed, SDC3A [this product] provides residual protection from *Pseudomonas aeruginosa*, *Staphylococcus aureus* and *Salmonella enterica* up to 24 hours after initial application. Do not [touch] [contact] treated surface after application if residual protection is to be maintained.

Fungus Control:

For effective control of the fungus *Trichophyton mentagrophytes*, the surface must be completely wet with SDC3A [this product] for 10 minutes. The surface may then be wiped dry with a clean towel. Re-apply when cleaning or when new growth appears.

NOTE: The following condensed instructions may be use in place of the above paragraph.

To kill fungus, [apply] [spray] [mist] SDC3A [this product] to the surface until thoroughly wet for 10 minutes. The surface may then be wiped dry with a clean towel. Re-apply when cleaning or when new growth appears.

***Viral Control:**

To kill Herpes Simplex Type 1 [F(1) Strain], Rotavirus, Human Coronavirus, Influenza A (H1N1), Swine Influenza A (H1N1), Adenovirus Type 2, Respiratory Syncytial Virus [RSV], Murine Norovirus [MNV-1], Norovirus [as Feline Calicivirus], Avian Influenza A, Influenza A Virus [Hong Kong strain], Rhinovirus [R37 Strain 151-1] and Polio Virus Type 2 [Lansing Strain] the surface must be completely wet with SDC3A [this product] for 10 minutes. The surface may then be wiped dry with a clean towel

NOTE: The following condensed instructions may be use in place of the above paragraph.

To kill viruses, [apply] [spray] [mist] SDC3A [this product] to the surface until thoroughly wet for 10 minutes. The surface may then be wiped dry with a clean towel.

Note to Reviewer: The following are optional phrases as outlined in the EPA's Guidance for Testing and Labeling Claims against Pandemic 2009 H1N1 Influenza A Virus (Formerly called Swine Flu)

[Respiratory illnesses attributable to Pandemic 2009 H1N1 are caused by influenza A virus. SDC3A [This product] is a broad-spectrum hard surface disinfectant that has been shown to be effective against [Influenza A Virus (H1N1)], [Influenza A Virus (H3N2)], [Avian Influenza A Virus] and [Swine Influenza A Virus (H1N1)] and is expected to inactivate all Influenza A viruses including Pandemic 2009 H1N1 (formerly called swine flu).]

SDC3A [[This product] has demonstrated effectiveness against Influenza A virus and is expected to inactivate all influenza A viruses including Pandemic 2009 H1N1 influenza A virus.]

Kills HIV-1 on pre-cleaned environmental surfaces/objects previously soiled with blood/body fluids in health care settings (or other settings in which there is an expected likelihood of soiling of inanimate surfaces/objects with blood or body fluids, and in which the surfaces/objects likely to be soiled with blood or body fluids can be associated with the potential for transmission of HIV): **Instructions for Cleaning and Decontamination Against HIV** on pre-cleaned environmental surfaces/objects previously soiled with blood/body fluids: **Personal Protection:** When handling items soiled with blood or body fluids, use appropriate barrier protection such as latex gloves, gowns, masks or eye coverings. **Cleaning Procedure:** Blood and other body fluids must be thoroughly cleaned from surfaces and objects before application of this disinfectant. **Contact Time:** Apply SDC3A [this product] to area to be treated. The surface must be completely wet with SDC3A [this product] for 30 seconds. The surface may then be

NOTE: [Bracketed] text is optional wording. **Bold/italicized text is information only and not part of the label. Page 4 of 10**

wiped dry with a clean towel. This contact time will not control all organisms listed on this label. Refer to application method of other organisms. **Disposal of Infectious Materials:** Blood and other body fluids should be autoclaved and disposed of according to federal, state and local regulations for infectious waste disposal.

Sanitization [of food contact surfaces]

Do not use this product on utensils, dishes or glassware.

NOTE TO REVIEWER: Products labeled only for residential use will include the following directions for use:

[To] Sanitize Food Contact Surfaces

Spray, pour or spread [SDC3A] [this product] on surface until thoroughly wet. Let stand for 60 seconds [one minute] and wipe with a clean towel or allow to air dry. No rinsing is required.

**[This product] kills 99.999% of *Escherichia coli* [E. coli] and *Staphylococcus aureus*.

NOTE TO REVIEWER: Products labeled for commercial/industrial use will include the following directions for use:

To sanitize food contact surfaces

or

To sanitize food processing equipment and other hard surfaces in food processing locations, dairies, restaurants and bars:

[Recommended] for sanitizing food processing equipment, dairy equipment, sink tops, countertops, refrigerated storage and display equipment, and other hard nonporous surfaces. Recommended for use in restaurants, dairies, food processing plants [establishments] [facilities] and bars.

[Clean, Rinse Sanitize]

Prior to application, remove gross food particles and soil by pre-flush or pre-scrape and when necessary, pre-soak. Thoroughly wash objects to be sanitized with a good detergent or cleaner followed by a potable water rinse prior to applying sanitizer. No potable water rinse is allowed after application as a sanitizer.

Apply [SDC3A] [this product] by spraying or by total immersion. Surfaces must remain wet for 60 seconds [1 minute].

If the [article] surface] cannot be washed and rinsed, clean thoroughly in an appropriate fashion prior to sanitizing.

**[This product] is a ready to use sanitizer that eliminates 99.999% of the following bacteria in 60 seconds:
Escherichia coli *Staphylococcus aureus*

-OR-

Prior to use in a federally inspected meat and poultry plants and dairies, food products and packaging materials must be removed from the room or carefully protected. A potable water rinse is not permitted following the use of this product as a sanitizer on previously cleaned hard, non-porous surfaces, provided that the surfaces are adequately drained before contact with food so that little or no residue remains.

Apply product to pre-cleaned hard surfaces thoroughly wetting surfaces with a cloth, mop, sponge, sprayer or by immersion. Surfaces should remain wet for 1 minute followed by adequate draining and air drying.

**[This product] is a ready to use sanitizer that eliminates 99.999% of the following bacteria in 60 seconds:
Escherichia coli (ATCC 11229) *Staphylococcus aureus*

[DIRECTIONS FOR SANITIZING FOOD PROCESSING EQUIPMENT AND FOOD CONTACT ARTICLES REGULATED BY 21CFR Sec. 178.1010: b(22), c(17)]

1. Scrape flush or presoak articles to remove gross food particles and soil.
2. Thoroughly wash articles in an appropriate detergent or cleaner.
3. Rinse articles thoroughly with potable water.
4. Sanitize articles by immersion in [this product] for 60 seconds. Articles too large for immersion should be thoroughly wetted with [this product] by rinsing, spraying or swabbing.
5. Remove immersed items from solution to drain and air dry. Non-immersed items should also be allowed to air dry.]

[U.S. PUBLIC HEALTH SERVICE FOOD SERVICE SANITIZATION RECOMMENDATIONS CLEANING AND SANITIZING:

Equipment shall be thoroughly pre-flushed or pre-scraped and pre-soaked when necessary to remove gross food particles and soil.

1. Thoroughly wash equipment in a hot detergent solution. Rinse equipment thoroughly with potable water.
2. Sanitize equipment by immersion for 60 seconds at a temperature of 75°.
3. For equipment that is too large to immerse, apply [this product] by rinsing, spraying or swabbing until thoroughly wetted.
4. Allow sanitized surfaces to drain and air dry. No potable water rinse is allowed.]

NOTE: [Bracketed] text is optional wording. Bold/italicized text is information only and not part of the label. Page 5 of 10

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[BEVERAGE DISPENSING EQUIPMENT SANITIZER DIRECTIONS

For sanitizing of bottling or pre-mixed dispensing equipment after cleaning thoroughly rinse equipment with a potable water rinse. Fill equipment with [this product] and allow to remain in the equipment for at least 60 seconds. Sanitizing solution should be drained from the system. To insure the removal of flavors, it is suggested that during changeover between products the system should be cleaned, rinsed and flushed with the sanitizing solution for at least 1 minute. Drain thoroughly and allow to air dry before reuse. No potable water rinse is allowed.]

[FOR SANITIZING IN FISHERIES, MILK, WINE, CITRUS, POTATO & ICE CREAM PROCESSING PLANTS: For use as a sanitizer on conveyor belts and equipment [to reduce or eliminate odors in the processing area]. Also for use on filling equipment to reduce bacteria. Follow directions for sanitizing food contact surfaces.]

[WISCONSIN STATE DIVISION OF HEALTH DIRECTIONS FOR EATING ESTABLISHMENTS

1. Scrape and pre-wash articles whenever possible.
2. Wash with a good detergent or compatible cleaner.
3. Rinse with potable water
4. Sanitize in [this product] without diluting. Immerse all articles for at least one minute or for contact time specified by governing sanitary code.
5. Place sanitized articles on a rack or drain board to air dry.

NOTE: A clean potable water rinse following sanitization is not permitted under Section HFS 196.13 of the Wisconsin Administrative Code.]

NOTE: Optional refill instructions

To refill [spray bottles]:

1. [REMOVE] Remove trigger sprayer [or cap] from empty bottle
2. [POUR] Remove cap from refill and pour contents directly into empty [bottle].
3. [USE] Replace trigger sprayer and use as you normally would.

NOTE: The following language will be printed on the label of products intended to be sold to health facilities:

This product is not to be used as a terminal sterilant/high level disinfectant on any surface or instrument that (1) is introduced directly into the human body, either into or in contact with the human body, either into or in contact with the bloodstream, or normally sterile areas of the body, or (2) contacts intact mucous membranes but which does not ordinarily penetrate the blood barrier or otherwise enter normally sterile areas of the body. This product may be used to pre-clean or decontaminate critical or semi-critical medical devices prior to sterilization or high level disinfection.

This statement will be used on NONREFILL LABEL CONTAINERS.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in a cool, dry area away from direct sunlight at temperatures above freezing.

Pesticide Disposal: Nonrefillable Container. Do not reuse or refill this container --or-- [Refill only with this product. Do not reuse or refill except as described in the directions for use.]. If empty: Place in trash or offer for recycling if available.

Rinse thoroughly before discarding in trash or recycling.

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This statement will be used on REFILLABLE CONTAINERS (typically 55 gallons or larger).

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in a cool, dry area away from direct sunlight at temperatures above freezing. Store in original container

Pesticide Disposal: To avoid wastes, use all material in this container by application according to label directions. If wastes cannot be avoided, offer remaining product to a waste disposal facility or pesticide disposal program (often such programs are run by state or local governments or by industry).

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a national Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

Container Handling: Refillable Container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

To clean the container before final disposal, empty the remaining contents from this container into a mix tank or storage tank. Fill the container about 1/4 full with solvent used in the end use product. Replace and tighten closures. Agitate vigorously or recirculate water with a pump for 2 minutes. Pour or pump rinsate into mix tank or rinsate collection system for later use or disposal. Repeat this rinsing procedure two more times

IN CASE OF EMERGENCY

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact [CHEMTREC 1-800-424-9300] or [the National Pesticide Information Center at 1-800-858-7378, Monday through Friday, 9 a.m. to 5 p.m] for emergency medical treatment information.

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Optional marketing phrases

[Kills] [Eliminates] [Effective against] *Choose one or more from the list below:*

- Salmonella enterica* [in 30 seconds[†]]
- Pseudomonas aeruginosa* [in 30 seconds[†]]
- Staphylococcus aureus*
- Listeria monocytogenes*
- Acinetobacter baumannii* [in 2 minutes]
- Campylobacter jejuni* [in 2 minutes]
- MRSA or [Methicillin Resistant Staph] or [Methicillin Resistant *Staphylococcus aureus*]
- CA-MRSA or [Community Associated MRSA] or [Community Associated Methicillin Resistant *Staphylococcus aureus*]
- CA-MRSA-PVL
- VRE or [Vancomycin-resistant Enterococcus] or [Vancomycin resistant Enterococcus faecium]
- Escherichia coli* O157:H7 [E. coli]
- Tricophyton mentagrophytes
- HIV [in 30 seconds[†]]
- Herpes Simplex Virus
- Influenza A Virus
- Rhinovirus
- Polio Virus Type 1
- Rotavirus
- Human Coronavirus
- Norovirus virus [as Feline Calicivirus]
- Avian Influenza A on pre-cleaned environmental hard surfaces
- Respiratory Syncytial Virus [RSV]
- Adenovirus [type 2]
- Influenza A (H1N1)
- Swine Influenza A (H1N1)
- ~~Equine Coronavirus type 1~~
- Murine Norovirus [in the presence of 5% soil]

- Kills germs in 30 seconds[†]
- Kills common household germs
- Kills germs [on surfaces you touch most]
- Kills common household germs including [*Salmonella enteric*], [*Staphylococcus aureus*], [*Listeria monocytogenes*], and [*E. coli*].
- Kills [*Salmonella*], [*Staphylococcus*], [*Listeria*], and [*E. coli*].
- Kills - Bacteria, Fungus and Virus*
- Disinfects common household surfaces
- Kills [common] cold] and [flu] virus[s]
- Disinfectant, Fungicidal & Virucidal* Spray
- Can help reduce the risk [danger] of cross contamination
- [Patented] Silver [Ion] Formula
- No dulling residue
- Disinfects without bleaching
- No harsh chemical smell
- Odorless
- Contains no [dyes] or [artificial fragrances]
- Colorless
- Ready-to-Use [Formula]
- No mixing required
- Eliminates odors caused by bacteria
- Disinfects household surfaces
- No Mixing Required
- Powered by [Axeohl®] [SDC 2400] [Axeohl Alternate brand name]
- For daily use
- Refill
- [Worldwide] Patented formula
- [U.S. Patent(s) 6,197,814 ; 6,583,176, 7,261,905, [additional patent numbers as issued]
- Other patents pending
- Use for a [fresh] [home] [environment] [kitchen]
- Commercial [Line] [Disinfectant]
- Industrial [Line] [Disinfectant]
- Hospital [Line] [Disinfectant]

Optional marketing phrases continued

Consumer [Line] [Disinfectant]

NOTE: [Bracketed] text is optional wording. ***Bold/italicized text is information only and not part of the label. Page 8 of 10***

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Retail [Line] [Disinfectant]
 Freight [Line] [Disinfectant]
 Janitorial [Line]
 Janitorial Disinfectant
 [FAST], [EASY], [EFFECTIVE]
 [Antimicrobial] [antibacterial] disinfectant
 Leaves surfaces disinfected
 For use on high touch surfaces
 Travel size
 For use in (insert use site from label) ✓
 For use on (insert use surface from label) ✓
 [Ideal for] [Formulated for] [Hospitality Environment(s)] [Institutional] [Childcare Environment(s)] [Medical Environment(s)] [Nursing Environment(s)] [Healthcare Environment(s)] [Athletic Environment(s)] [Educational Environment(s)]
 A New Generation of Protection ✓
 A New Generation Disinfectant ✓
 As seen on TV may include graphic ✓



Made in the USA [may include graphic of American flag]
 This product has demonstrated effectiveness against Influenza A Virus [Avian Influenza A Virus] [Swine Influenza A Virus] and is expected to inactivate all Influenza A viruses including Pandemic 2009 H1N1 (formerly called swine flu).
 Kills Pandemic 2009 H1N1 influenza A virus (formerly called swine flu).
 Kills Pandemic 2009 H1N1 influenza A virus.

The following phrases can also be used for products labeled as a food contact sanitizer

No Rinsing required
 No Rinse Formula
 No Rinse sanitizer
 Sanitize without rinsing
 For daily [use] [sanitization]
 Sanitizes kitchen surfaces
 Household sanitizer
 Institutional sanitizer
 Kills 99.999% of bacteria [in 60 seconds]**
 Kills 99.999% of Escherichia coli (E. coli) [in 60 seconds]**
 Kills 99.999% of Staphylococcus aureus [in 60 seconds]**
 Kills 99.999% of bacteria that cause food borne illnesses [food poisoning]
 Effective sanitizer for food contact surfaces
 For use in [insert one or more of the use sites listed on the label]
 For use on [insert one or more of the use surfaces listed on the label]
 For sanitizing [insert one or more of the food contact use surfaces]
 No [measuring] [mixing] required
 Effective sanitizer for food [and beverage] processing equipment [facilities]

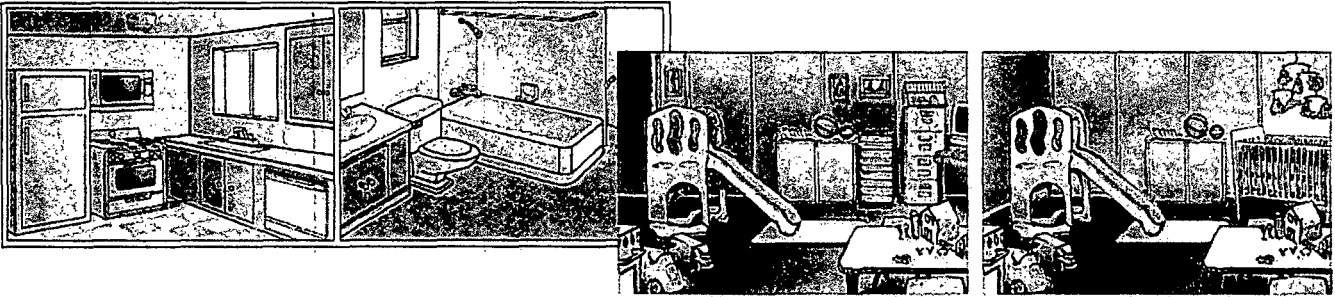
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KEY:

- *-Refer to viruses
- ‡-Refer to organisms controlled with 30 second kill time
- ** Refers to sanitizer claims

These or similar optional graphics may be used to demonstrate use sites (graphics are larger here than they will appear on the label)



THE FOLLOWING TABLE IS OPTIONAL TEXT:

Organism	ID
<i>Pseudomonas aeruginosa</i>	ATCC#15442
<i>Staphylococcus aureus</i>	ATCC#6538
<i>Salmonella enterica</i>	ATCC#10708
<i>Listeria monocytogenes</i>	ATCC#19111
Vancomycin resistant <i>Enterococcus faecium</i> (VRE)	ATCC#700221
Methicillin resistant <i>Staphylococcus aureus</i> (MRSA)	ATCC#700698
Community Associated Methicillin resistant <i>Staphylococcus aureus</i> (CA-MRSA)	NRS123, USA 400
Community Associated Methicillin resistant <i>Staphylococcus aureus</i> (CA-MRSA-PVL)	NRS 192
<i>Escherichia coli</i> O157:H7	ATCC#43888
<i>Acinetobacter baumannii</i>	ATCC#19606
<i>Campylobacter jejuni</i>	ATCC#29428
Trichophyton mentagrophytes (Athlete's Foot Fungus)	ATCC#9533
*HIV type 1- Strain HTLV IIIB	HTLV-IIIB
*Herpes Simplex Type 1 VR-733 F(1) Strain	ATCC VR-733
*Rotavirus	Strain WA, Ottawa
*Human Coronavirus	ATCC VR-740
*Influenza A (H1N1)	ATCC VR-1469
*Swine Influenza A (H1N1)	ATCC VR-333
*Respiratory Syncytial Virus [RSV]	ATCC VR-26
*Adenovirus Type 2	ATCC VR-846
*Murine Norovirus	MNV-1.CW1
*Norovirus [as Feline Calicivirus]	ATCC VR-782
*Avian Influenza A	ATCC VR-2072
*Influenza A [VR-544, Hong Kong strain]	ATCC VR-544
*Rhinovirus [R37 VR-1147, Strain 151-1]	ATCC VR-1147
*Polio Type 2, [VR-1002, Lansing Strain]	ATCC VR-1002

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